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Tehama-Colusa Canal Authority

P.O. BOX 1025 • 5513 HWY 162 • WILLOWS, CA 95988 • 916-934-2125 • FAX 916-934-2355

August 1, 1997

Mr. Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Ecosystem Restoration Program Plan, Volume I, Review Draft of June 13, 1997

Dear Lester,

We were pleased to receive the June 13, 1997 Volume I Review Draft of the Ecosystem Restoration Program Plan and look forward to Volume II and III. We have included our comments on Volume I as follows:

- **Natural Sediment Supply, Vision**, page 30: The second paragraph states: "*A common barrier to sediment transport in Central Valley rivers are diversion dams (e.g. Daguerre Dam on the Yuba River, or Red Bluff Dam on the Sacramento River)*" The gates of the Red Bluff Diversion Dam are now out of the water for 8 out of 12 months each year from September 15 to May 15th. This is the period of significant flow (and corresponding high water velocities) on the Sacramento River and the time when most sediment is transported. With the gates out of the river, there is now no impediment to this sediment transport. Although the Red Bluff Dam does create a barrier during the summer months (May 15th through September 15) when the gates are in, river flows and velocities are not strong enough during this period to transport a significant volume of sediment and its overall impact to sediment transport should be minimal. Because of this, we would request that the reference to the Red Bluff Diversion Dam be removed.
- **Stressor Description**, page 225: The discussion of diversion dams leaves the impression that the dams are "stressors" year around. In the case of the Red Bluff Diversion Dam, the gates are in the river and acting as a barrier to fish passage only during the 4 months of summer. An added clarification would be appreciated.
- **Water Diversions, Vision**, page 226: The bottom paragraph on this page refers to the "*Red Bluff Research Program*" as studying alternatives, "*including pumping from the river without returning entrained salmon and steelhead through a bypass system.*" We believe this statement is mis-worded and should read "*including pumping from the river and returning entrained salmon and steelhead through a bypass system.*"

- ***Water Diversions, Implementation Objective, Targets and Programmatic Actions***, page 228: Although we agree with the bullet "*Support completion of research at the Red Bluff Research Program*," this experimental pumping system is not the only solution that should be considered at Red Bluff and we encourage the objective to also look into other programs that can achieve the vision including "*gate manipulations to provide fish attraction flows to the ladders*" and "*design and construction of new, state-of-the-art-fish ladders*" as part of the answer to developing a solution to fish passage problems at Red Bluff.
- ***Dams, Reservoirs, Weirs, and Other Human-Made Structures, Stressor Description***, page 229: Red Bluff Dam is considered a stressor here, as it was under *Water Diversions*. We assume that it will be looked at under only one of these program factors. The *Implementation Objective, Targets, and Programmatic Actions* on page 231 includes actions that would address ladder improvements as we have suggested under *Water Diversions* and we support these actions.
- ***Predation and Competition, Stressor Description, Chinook Salmon as a Prey Species***, page 266 and 267: It is stated that "*Predation at RBDD on juvenile chinook salmon is believed to be higher than natural levels because of the water quality and flow dynamics associated with the operation of this structure.*" The text then references numerous studies completed in the late 1970's through 1989. It is important to note that all of these studies were conducted while the gates were in at RBDD twelve months of the year. Conditions at RBDD have radically changed since these old studies were conducted with the gates now out of the water for 8 out of the 12 months each year. No studies have been done since the "gates out" period started.

The text goes on to state "*Late-migrating juvenile chinook salmon that pass RBDD in early spring most likely suffer the greatest losses because Squawfish abundance is higher at this time of year and river conditions are generally favorable for predators, especially during dry years.*" Again, the gates are now out of the river during this period and predation no longer appears to be a problem. The gates are currently out until May 15th, well past what is considered "early spring" allowing the unimpeded passage of both juvenile salmon and Squawfish. It is recommended that Mr. Gary Stern, Fishery Biologist with the NMFS (Santa Rosa Office) be contacted to discuss current predation conditions at RBDD.

- ***Opportunities to Reduce Predation***, page 269: Once again, we request the text reflect the current operations at RBDD. The last two Squawfish Derbys at RBDD were "fishing failures" and only a very few squawfish were caught. In the first paragraph, the text also

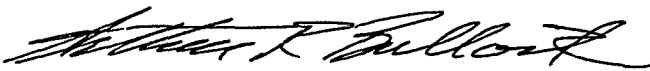
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reads: *"Sacramento Squawfish are also more abundant at RBDD during spring, and a spring fishery could cause incidental catches of winter-run chinook."* This statement is a conclusion based on obsolete predator studies conducted pre-gates out operation and should not be made without the benefit of new studies analyzing the effects of "gates out" operation.

We also do not agree with the *"preferred solution to reduce predation at RBDD is to eliminate or reduce the feeding habitat that RBDD creates by seasonally or permanently raising the gates."* We believe this statement implies an alternative to RBDD has been pre-determined by this ERPP. Red Bluff gates are now raised seasonally. The lack of studies regarding predation in relationship to the current operation of gates out from September 15th through May 15th makes this statement incorrect and inappropriate. We request that this entire section be revised to reflect today's conditions.

We appreciate the opportunity to review this Volume I and hope that our comments will receive serious consideration. If you have any questions regarding these comments, please contact me at the above number.

Sincerely,



Arthur R. Bullock
General Manager

ARB/jj

cc Dick Daniel